

THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:	*	
	*	CASE NO. 14-09749 BKT
ABIGAIL LOPEZ RODRIGUEZ	*	
	*	CHAPTER 13
<u>DEBTOR</u>	*	

**DEBTOR'S MOTION FOR EXTENSION OF TIME TO
REPLY TO *TRUSTEE'S MOTION TO DISMISS*, DOCKET NO. 58**

TO THE HONORABLE COURT:

COMES NOW, **ABIGAIL LOPEZ RODRIGUEZ**, debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. On October 14, 2016, the Chapter 13 Trustee filed a motion requesting dismissal stating that the debtor was in arrears in the Plan payments in the sum of \$2,320.00 or 10.80 payments of \$215.00.
2. The debtor respectfully submits that on October 28, 2016, the debtor made a partial Plan payment of \$510.00 reducing the amount owed to the Trustee to \$1,810.00.
3. Furthermore, the debtor met with the undersigned attorney to discuss the above stated situation and the debtor respectfully states that she is in the process of obtaining the funds to cure the aforementioned Plan arrears.
4. The debtor respectfully states that she incurred in the aforementioned Plan arrears due to certain unexpected medical expenses incurred during the last few months. However, the debtor respectfully understands that she may be able to cure the Plan arrears within a reasonable time or partially cure the Plan arrears and file a modified Plan in order to dispose of this matter.

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5. Thus, the debtor needs additional time to obtain the funds needed to cure the Plan arrears and adequately reply to the *Trustee's Motion to Dismiss*, docket no. 58.

6. Based on the aforementioned, the debtor needs an extension of time of thirty (30) days within to reply to the *Trustee's Motion to Dismiss*, docket no. 58, in the present case. **This extension of time to expire on December 14, 2016.**

WHEREFORE, debtor, through the undersigned attorney, respectfully requests that for the above stated reasons this Honorable Court grant the requested extension of time.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system which will send notice of same to: the Chapter 13 Trustee, Alejandro Oliveras Rivera, Esq.; I also certify that a copy of this motion was sent via US Mail to the debtor, Abigail Lopez Rodriguez, HC 11 Box 12502 Humacao PR 00791.

RESPECTFULLY SUBMITTED, in San Juan, Puerto Rico, this 14th day of November, 2016.

/s/Roberto Figueroa Carrasquillo
USDC #203614
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